

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

***In Re Kobalt Music Publishing America, Inc.  
Coordinated Copyright Cases***

*This filing relates to:*

All Coordinated Cases

24-cv-05454 (ER) (BCM)  
24-cv-05455 (JAV) (BCM)  
24-cv-05456 (AKH)(BCM)  
24-cv-05457 (JGK) (BCM)  
24-cv-05458 (VM) (BCM)  
24-cv-05459 (JAV) (BCM)  
24-cv-05460 (LJL) (BCM)  
24-cv-05462 (GHW)(BCM)  
24-cv-05463 (JLR) (BCM)  
24-cv-05464 (JGK) (BCM)  
24-cv-05465 (GHW)(BCM)  
24-cv-05466 (JHR) (BCM)

**NOTICE OF DEFENDANTS' MOTION  
TO COMPEL THE PRODUCTION OF DOCUMENTS**

Pursuant to Federal Rule of Civil Procedure 45(d)(2)(B)(i), Local Civil Rule 7.1, and leave granted by this Court during the February 10, 2025 Initial Case Management Conference in this matter, Defendants in the above-referenced cases (the “Coordinated Defendants”) hereby provide notice that they intend to move to compel the production of documents sought in subpoenas served on non-party TuneSat LLC in each of the above case numbers (the “Coordinated Cases”). Coordinated Defendants request that the Court (1) grant their Motion to Compel the Production of Documents from TuneSat LLC in its entirety, and (2) compel TuneSat LLC to produce all of the documents called for by the January 20, 2025 subpoenas served in each of the Coordinated Cases.

Dated: New York, New York  
March 13, 2025

Respectfully submitted,



David S. Slovic

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**CERTIFICATE OF SERVICE**

Undersigned counsel hereby certifies that on this 13th day of March, 2025, Coordinated Defendants' Motion to Compel the Production of Documents and Coordinated Defendants' Memorandum of Law in Support of the Motion to Compel were served by U.S. Mail and e-mail on the following parties and non-party:

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